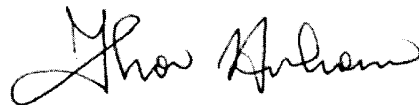


EXHIBIT A

Declaration of Thor Halvorssen

1. I, Thor Halvorssen, have made diligent efforts to obtain the home addresses of Francisco Convit Guruceaga, Pedro Trebbau Lopez, and Leopoldo Alejandro Betancourt Lopez. I have been unable to establish with any certainty what their addresses are in Venezuela.
2. My efforts to obtain their home addresses has been ineffective. The only address I have been able to obtain is their company address at Derwick Associates. I do not believe that these individuals work out of that office.
3. Moreover, the Derwick Associates office in Caracas is guarded by heavily-armed men who work for Venezuela's secret police.
4. Private gun ownership in Venezuela is banned and only the police, army, and approved entities are allowed the use of firearms. Automatic weapons like the machine guns in these photographs are restricted to government functionaries in state security.
5. The attached photos were obtained from the Facebook page of Mr. Betancourt's lead bodyguard: Kelvin Vivas. The photos include pictures of Mr. Vivas and Mr. Betancourt prior to helicopter travel; photos of Mr. Vivas and other bodyguards in what appears to be Mr. Betancourt's garage; photos of Mr. Vivas as he prepares to travel in a government security motorcycle; and photos of Mr. Vivas and other bodyguards in the Derwick offices wearing the traditional red shirts and armbands of Venezuela's feared "Bolivarian circles" militia.

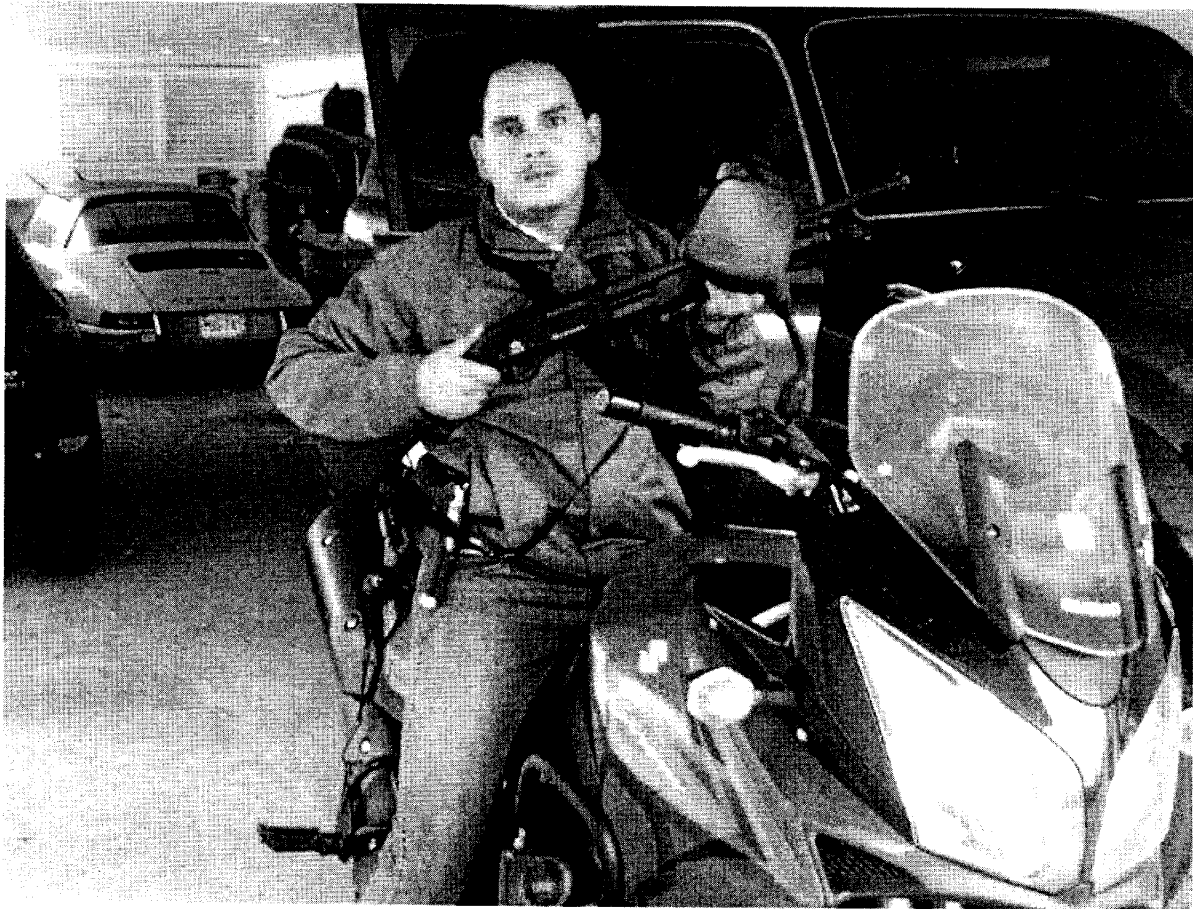
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 20th day of July, 2018 in London, England.



Thor Halvorssen











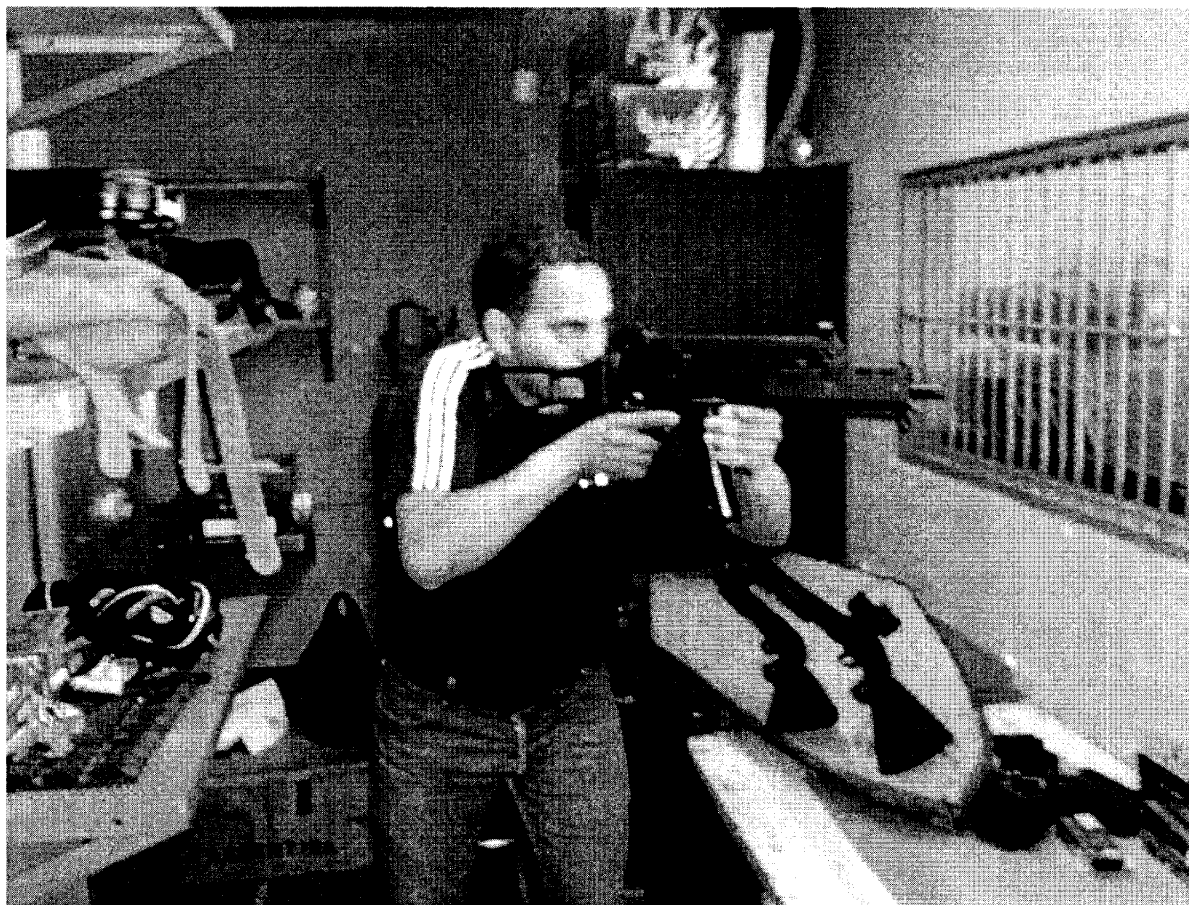






EXHIBIT B

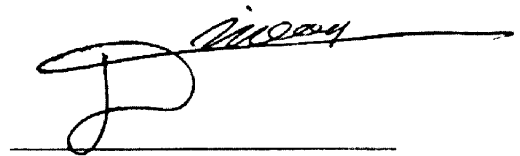
DECLARATION OF DANIEL SIERRA

I, Daniel Sierra declare:

1. I have personal knowledge of each fact set forth in this declaration.
2. I am the International Representative from the Venezuelan National Assembly of the Permanent Commission of Controllershship. In that role I have the authority to liaise with any public and private entity including U.S. government officials such as those in the U.S. Department of the Treasury's Office of Foreign Assets Control as well as the U.S. Department of Justice.
3. The Venezuelan National Assembly is the legislative branch of the Venezuelan government and, at present, the only internationally-recognized entity considered democratically legitimate both by the European Parliament and the governments of the United States, Canada, and all members of the Organization of American States.
4. I am familiar with the activities of Mr. Leopoldo "Alejandro" Betancourt Lopez ("Betancourt"), Francisco Convit-Guruceaga ("Convit"), and Pedro Trebbau-Lopez ("Trebbau"), both through their reputations, media reports, and as a result of my official duties.
5. I am aware of Messrs. Betancourt, Convit, and Trebbau's wealth and the extent of their power in Venezuela which includes relationships with government officials, with the son of our late president Hugo Chavez, and with members of the military and intelligence establishment. I am aware that they are able to marshal the resources of the state to the extent that their personal security is provided by active and armed members of the Venezuelan state security apparatus.
6. Mr. Betancourt and his cousins, Mr. Trebbau and Mr. Convit, are influential enough in Venezuela that they could ensure that any individual—including a government official—seeking to engage in service of process in Venezuela, using the Hague convention, would be unable to effectively engage in service.
7. Messrs. Betancourt, Trebbau, and Convit would stymie and block any attempt at the highest levels. A process server seeking to serve these individuals would meet with intimidation and even arrest by Venezuela's secret service (the SEBIN police force).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19 day of July, 2018 at Washington, DC

A handwritten signature in black ink, appearing to read 'Daniel Sierra', is written over a horizontal line.

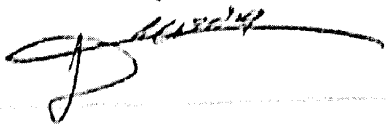
Daniel Sierra

DECLARACIÓN DE DANIEL SIERRA

Yo, Daniel Sierra, declaro:

1. Tengo conocimiento personal de cada hecho establecido en esta declaración.
2. Soy Representante Internacional de la Asamblea Nacional Venezolana de la Comisión Permanente de Contraloría. En esa función, tengo la autoridad para actuar de enlace con cualquier entidad pública y privada, incluyendo funcionarios del gobierno de EE. UU. así como los que están en la Oficina de Control de Activos Extranjeros del Departamento de Tesorería de EE. UU., así como el Departamento de Justicia de EE. UU.
3. La Asamblea Nacional venezolana es la rama legislativa del gobierno venezolano y, en la actualidad, la única entidad internacionalmente reconocida considerada democráticamente legítima tanto por el Parlamento Europeo como por los gobiernos de los Estados Unidos, Canadá y todos los miembros de la Organización de Estados Americanos.
4. Estoy familiarizado con las actividades del Sr. Leopoldo "Alejandro" Betancourt Lopez ("Betancourt"), Francisco Convit-Guruceaga ("Convit") y Pedro Trebbau-Lopez ("Trebbau"), a través de sus reputaciones, reportajes en los medios de comunicación, así como gracias a mis deberes oficiales.
5. Estoy al tanto de los recursos financieros de los Sres. Betancourt, Convit y Trebbau y el alcance de su poder en Venezuela, que incluye relaciones con funcionarios del gobierno, con el hijo de nuestro difunto presidente Hugo Chávez y con miembros del ejército y de los organismos de inteligencia. Estoy consciente de que ellos utilizan los recursos del estado para su seguridad personal; sus escoltas son miembros activos y armados del aparato paramilitar del Estado venezolano.
6. El Sr. Betancourt y sus primos, el Sr. Trebbau y el Sr. Convit, son lo suficientemente influyentes en Venezuela como para garantizar que cualquier persona, incluyendo un funcionario del gobierno, que desee procesar el servicio de una demanda en Venezuela, utilizando la Convención de La Haya, sería incapaz de llevar a cabo el servicio.
7. Los Sres. Betancourt, Trebbau y Convit obstaculizarían y bloquearían cualquier intento al más alto nivel. Un servidor de procesos que busen servir a estas personas enfrentarían intimidación e incluso arresto por parte del servicio secreto de Venezuela (el SEBIN).
8. Declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que lo anterior es verdadero y correcto. He escrito esta declaración en español y he creado una traducción al inglés.

Firmado este 19 días de julio de 2018 en Washington, DC



Daniel Sierra